

1 Michael Gerard Fletcher (State Bar No. 070849)  
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2 Gerrick M. Warrington (State Bar No. 294890)  
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3 FRANDZEL ROBINS BLOOM & CSATO, L.C.  
1000 Wilshire Boulevard, Nineteenth Floor  
4 Los Angeles, California 90017-2427  
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6 Attorneys for Secured Creditor

5 Attorneys for Secured Creditor  
ARCHWAY BROADWAY LOAN SPE, LLC

**UNITED STATES BANKRUPTCY COURT  
CENTRAL DISTRICT OF CALIFORNIA  
LOS ANGELES DIVISION**

12 In re  
13 SEATON INVESTMENTS, LLC, *et al.*,  
14 Debtors and Debtors-in-  
15 Possession.  
Lead Case No. 2:24-bk-12079-VZ  
Jointly Administered with Case Nos.:  
2:24-bk-12080-VZ; 2:24-bk-12081-VZ;  
2:24-bk-12082-VZ; 2:24-bk-12091-VZ;  
2:24-bk-12074-VZ; 2:24-bk-12075-VZ;  
2:24-bk-12076-VZ

18 | Affects:

- 18       All Debtors  
18       Seaton Investments, LLC  
18       Colyton Investments, LLC  
19       Broadway Avenue Investments, LLC  
20       SLA Investments, LLC  
20       Negev Investments, LLC  
21       Alan Gomperts  
21       Daniel Halevy  
21       Susan Halevy

**DECLARATION OF GERRICK M.  
WARRINGTON IN SUPPORT OF REPLY  
IN SUPPORT OF ARCHWAY  
BROADWAY LOAN SPE, LLC'S  
RENEWED MOTION FOR RELIEF  
FROM AUTOMATIC STAY**

Date: December 10, 2024  
Time: 10:30 a.m.  
Crtrm.: 1368  
255 E. Temple Street  
Los Angeles, CA 90012

Hon. Vincent P. Zurzolo

1 I, Gerrick M. Warrington, declare:

2 1. I am a partner at Frandzel Robins Bloom & Csato, L.C., counsel of record for  
3 secured creditor Archway Broadway Loan SPE, LLC, a Delaware limited liability company,  
4 successor in interest to Archway Real Estate Income Fund I REIT, LLC fka Archway Real Estate  
5 Income Fund I SPE I, LLC (“Archway”). If called as a witness, I could and would competently  
6 testify to all facts within my personal knowledge, except where stated upon information and belief.

7 2. This declaration is submitted in support of Archway’s Renewed Motion for Relief  
8 from Stay (Dkt. 299).

9 3. On or about November 25, 2024, Archway issued discovery, including subpoenas  
10 directed to the proposed tenants, The DMB Fund and Levav Group LLC, as well as the proposed  
11 DIP lender, New Millennia Group.

12 4. To date, the process server’s attempts to serve the proposed tenants and DIP lender  
13 have failed. True and correct copies of the declarations of the process server are attached hereto as  
14 **Exhibit 32.**

15 I declare under penalty of perjury under the laws of the United States of America that the  
16 foregoing is true and correct and that this Declaration was executed on this 3rd day of December,  
17 2024, at Los Angeles, California.

18  
19 /s/ Gerrick M. Warrington  
20 Gerrick M. Warrington

FRANDZEL ROBINS BLOOM & CSATO, L.C.  
1000 WILSHIRE BOULEVARD, NINETEENTH FLOOR  
LOS ANGELES, CALIFORNIA 90017-2427  
(323) 852-1000

# EXHIBIT 32

ATTORNEY OR PARTY IDENTIFIED: **Gerrick M. Warrington Esq.** State Bar number and address:  
**FRANDZEL ROBINS BLOOM & CSATO**  
**1000 Wilshire Boulevard, 19th Floor Los Angeles, CA 90017**

TELEPHONE NO.: **(323) 852-1000**

FAX NO.:

E-MAIL ADDRESS (*Optional*):

ATTORNEY FOR (*Name*):

**USBC/LOS ANGELES/CENTRAL DIVISION**

STREET ADDRESS: **255 E. TEMPLE**

CITY AND ZIP CODE: **LOS ANGELES, CA 90012**

REFERENCE NUMBER:

**101415-0002**

Plaintiff(s): **Central In re SEATON INVESTMENTS, LLC, et al**

Defendant(s): **The DMB Fund, Attn**

CASE NUMBER:

**DECLARATION OF DILIGENCE**

**2:24-bk-12079-VZ**

I received the within assignment for filing and/or service on November 25, 2024 and that after due and diligent effort I have not been able to serve said person. I attempted service on this servee on the following dates and times:

Servee: **The DMB Fund, Attn**

Documents: **SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A BANKRUPTCY CASE (OR ADVERSARY PROCEEDING)**

Address: **2350 Castle Heights Ave  
Los Angeles, CA 90034**

As enumerated below:

**11/26/2024 -- 10:20 AM**    2350 Castle Heights Ave

**Business**                      Los Angeles, CA 90034

Arrived at address and knocked loudly on front door, several times with no answer. No activity seen anywhere in the home or on the property. No mail in the mailbox. No cars in driveway.

**11/29/2024 -- 9:08 AM**    2350 Castle Heights Ave

**Business**                      Los Angeles, CA 90034

Returned to property, and knocked loudly on front door several times. I got no answer. No activity seen or heard. No cars parked on driveway or in front of home.

**12/1/2024 -- 6:19 PM**    2350 Castle Heights Ave

**Business**                      Los Angeles, CA 90034

Returned to property, and knocked loudly on front door several times. I got no answer. No activity seen or heard. No cars parked on driveway or in front of home.

  
County: **Los Angeles**  
Registration No.: **2018032404**  
**Nationwide Legal, LLC**  
**1609 James M Wood Blvd.**  
**Los Angeles, CA 90015**

I declare under penalty of perjury under the laws of the State of California that I am over the age of 18, not a party to this action and that the foregoing is true and correct. This declaration was executed on 12/3/2024.

Signature: 

**Robert Brooks**

**DECLARATION OF DILIGENCE**

Order#: LA587842/DilFormat.mdl

ATTORNEY OR PARTY IDENTIFIED: **Gerrick M. Warrington Esq.** State/Bar number and address:  
**FRANDZEL ROBINS BLOOM & CSATO**  
**1000 Wilshire Boulevard, 19th Floor Los Angeles, CA 90017**

TELEPHONE NO.: **(323) 852-1000**

FAX NO.:

E-MAIL ADDRESS (*Optional*):  
ATTORNEY FOR (*Name*):

**USBC/LOS ANGELES/CENTRAL DIVISION**

STREET ADDRESS: **255 E. TEMPLE**

CITY AND ZIP CODE: **LOS ANGELES, CA 90012**

REFERENCE NUMBER:

**101415-0002**

Plaintiff(s): **SEATON INVESTMENTS, LLC, et al.**

Defendant(s):

**DECLARATION OF DILIGENCE**

CASE NUMBER:

**2:24-bk-12079-VZ**

I received the within assignment for filing and/or service on November 25, 2024 and that after due and diligent effort I have not been able to serve said person. I attempted service on this servee on the following dates and times:

Servee: **Levav Group LLC**

Documents: **SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A BANKRUPTCY CASE (OR ADVERSARY PROCEEDING)**

Address: **1702 S Robertson Blvd # 261  
Los Angeles, CA 900354316**

As enumerated below:

**11/26/2024 -- 11:01 AM** 1702 S Robertson Blvd # 261

**Business** Los Angeles, CA 900354316

Arrived at address which is a PO box shipping store. Upon speaking with the store manager, she stated that PO box number 261 is being used by an individual by the name of Aaron Stock.

  
County: **Los Angeles**  
Registration No.: **2018032404**  
**Nationwide Legal, LLC**  
**1609 James M Wood Blvd.**  
**Los Angeles, CA 90015**

I declare under penalty of perjury under the laws of the State of California that I am over the age of 18, not a party to this action and that the foregoing is true and correct. This declaration was executed on 12/3/2024.

Signature: 

**Robert Brooks**

**DECLARATION OF DILIGENCE**

Order#: LA587839/DilFormat.mdl

ATTORNEY OR FIRM INFORMATION [Redacted] State/Bar number and address  
Gerrick M. Warrington Esq. SBN: 294890  
FRANDZEL ROBINS BLOOM & CSATO  
1000 Wilshire Boulevard, 19th Floor Los Angeles, CA 90017

TELEPHONE NO.: (323) 852-1000

FAX NO.:

E-MAIL ADDRESS (Optional):  
ATTORNEY FOR (Name):

**USBC/LOS ANGELES/CENTRAL DISTRICT OF CA**

STREET ADDRESS: 255 E. TEMPLE ST.

CITY AND ZIP CODE: LOS ANGELES, CA 90012

REFERENCE NUMBER:

101415-0002

Plaintiff(s): In re SEATON INVESTMENTS, LLC, et al.

Defendant(s):

**DECLARATION OF DILIGENCE**

CASE NUMBER:

2:24-bk-12079-VZ

I received the within assignment for filing and/or service on November 25, 2024 and that after due and diligent effort I have not been able to serve said person. I attempted service on this servee on the following dates and times:

Servee: Zenith Healthcare Management, LLC

Documents: SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A BANKRUPTCY CASE (OR ADVERSARY PROCEEDING)

Address: 5030 Campus Dr  
Newport Beach, CA 926602102

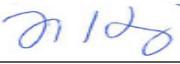
As enumerated below:

11/27/2024 -- 1:43 PM 5030 Campus Dr  
**Business** Newport Beach, CA 926602102

Company at location is the Horowitz Group and staff has never heard of subject, company or agent we are looking for. The Horowitz Group is the only company at this address.

County: Orange  
Registration No.: 1530  
Nationwide Legal, LLC  
1609 James M Wood Blvd.  
Los Angeles, CA 90015

I declare under penalty of perjury under the laws of the State of California that I am over the age of 18, not a party to this action and that the foregoing is true and correct. This declaration was executed on 12/3/2024.

Signature: 

Frank Harrigan

**DECLARATION OF DILIGENCE**

Order#: LA587876/DilFormat.mdl

ATTORNEY OR PARTY NOT IDENTIFIED  
Case 2:24-bk-12079-VZ Doc 384-1 Filed 12/03/24 Entered 12/03/24 17:00:06 Desc  
Gerrick M. Warrington Esq SBN: 294890  
FRANDZEL ROBINS BLOOM & CSATO  
1000 Wilshire Boulevard, 19th Floor Los Angeles, CA 90017

TELEPHONE NO.: (323) 852-1000

FAX NO.:

E-MAIL ADDRESS (Optional):  
ATTORNEY FOR (Name):

**USBC/LOS ANGELES/CENTRAL DISTRICT OF CA**

STREET ADDRESS: 255 E. TEMPLE ST.

CITY AND ZIP CODE: LOS ANGELES, CA 90012

REFERENCE NUMBER:

101415-0002

Plaintiff(s): In Re: SEATON INVESTMENTS, LLC, et al.

Defendant(s):

**DECLARATION OF DILIGENCE**

CASE NUMBER:

2:24-bk-12079-VZ

I received the within assignment for filing and/or service on November 25, 2024 and that after due and diligent effort I have not been able to serve said person. I attempted service on this servee on the following dates and times:

Servee: New Millennia Group

Documents: SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A BANKRUPTCY CASE (OR ADVERSARY PROCEEDING)

Address: 2945 Townsgate Rd Ste 200  
Westlake Village, CA 913615866

As enumerated below:

11/27/2024 -- 10:18 AM 2945 Townsgate Rd Ste 200  
Business Westlake Village, CA 913615866  
Unable to gain access to suite this day. I will continue.

11/29/2024 -- 3:11 PM 2945 Townsgate Rd Ste 200  
Business Westlake Village, CA 913615866  
Door locked. I will continue.

12/2/2024 -- 1:00 PM 2945 Townsgate Rd Ste 200  
Business Westlake Village, CA 913615866  
Bad address. I spoke with onsite female for this executive suite who said New Millennia Group signed a lease in Feb 2022 but never moved in and returns their mail to USPS. The female receptionist is a black female, 35 years, Sitting, 180 lbs.

County:  
Registration No.: 787  
Nationwide Legal, LLC  
1609 James M Wood Blvd.  
Los Angeles, CA 90015

I declare under penalty of perjury under the laws of the State of California that I am over the age of 18, not a party to this action and that the foregoing is true and correct. This declaration was executed on 12/3/2024.

Signature: Sandra Espinoza  
Sandra Espinoza

**DECLARATION OF DILIGENCE**

Order#: LA587862/DilFormat.mdl